

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SECURITIES AND EXCHANGE COMMISSION,))
))
Plaintiff,))
v.)	Civil Action No. 1:20-cv-05227
JOHN M. FIFE, CHICAGO VENTURE PARTNERS, L.P., ILIAD RESEARCH AND TRADING, L.P., ST. GEORGE INVESTMENTS LLC, TONAQUINT, INC., AND TYPENEX CO-INVESTMENT, LLC,)	Honorable Martha M. Pacold Honorable Daniel P. McLaughlin
Defendants.))

STIPULATION TO DISMISS AND RELEASE

Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, Plaintiff Securities and Exchange Commission (the “Commission”) and Defendants John M. Fife, Chicago Venture Partners, L.P., Iliad Research and Trading, L.P., St. George Investments LLC, Tonaquint, Inc., and Typenex Co-Investment, LLC (collectively, “Defendants”) hereby stipulate and agree as follows:

WHEREAS, the Commission filed a Complaint in this civil enforcement action (the “Litigation”) on September 3, 2020;

WHEREAS, in the exercise of its discretion and as a policy matter, the Commission believes the dismissal of this case with prejudice is appropriate;

WHEREAS, the Commission’s decision to seek dismissal of this Litigation does not necessarily reflect the Commission’s position on any other case; and

WHEREAS, the Commission and the Defendants agree to have this Litigation dismissed

on the terms set forth herein.

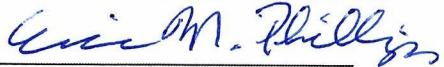
NOW, THEREFORE,

1. Pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), the Commission and the Defendants stipulate and agree that this Litigation shall be dismissed with prejudice as to the conduct alleged in the Complaint through the date of the filing of this Stipulation, and without costs or fees to either party.
2. Defendants, for themselves and any of their agents, attorneys, employees, or representatives, hereby waive and release:
 - a. Any and all rights under the Equal Access to Justice Act, the Small Business Regulatory Enforcement Fairness Act of 1996, or any other provision of law to seek from the United States, or any agency, or any official of the United States acting in his or her official capacity, directly or indirectly, reimbursement of attorney's fees or other fees, expenses, or costs expended by Defendant[s] that in any way relate to the Litigation, including, but not limited to, investigative steps taken prior to commencing the Litigation.
 - b. Any and all claims, demands, rights, and causes of action of every kind and nature, asserted or unasserted, against the Commission and its present and former officers or employees that arise from or in any way relate to the Litigation, including, but not limited to, investigative steps taken prior to commencing the Litigation.
3. Each of the undersigned represents that they have the authority to execute this stipulation on behalf of the party so indicated.

[signatures on next page]

STIPULATED AND AGREED:

DATED: June 18, 2025



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* *Pro hac vice*